

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN**

CRAIG CUNNINGHAM,

Plaintiff,

v.

MICHAEL MONTES, *et al.*,

Defendants.

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Case No. 3:16-cv-00761-jdp

Honorable Judge James D. Peterson

PLAINTIFF'S PROPOSED VOIR DIRE QUESTIONS

Now comes the Plaintiff, CRAIG CUNNINGHAM, by and through his attorney, and pursuant to the Court's Preliminary Pretrial Conference Order (Dkt. #98), Plaintiff submits the following proposed voir dire questions:

1. Have you ever received automated telephone calls?
2. If yes, how do you feel about those calls?
3. Have you ever answered a telephone call only to hear an automated voice or recorded message on the other end of the line?
4. If yes, how do you feel about those calls and messages?
5. How often do you receive telemarketing calls?
6. How do you feel about telemarketers in general?
7. Do you feel it's important that companies who place automated calls, use prerecorded messages, or place telemarketing calls have received your consent before calling you?
8. What sort of telemarketing calls have you received?
9. Have you ever received telemarketing calls trying to sell you on business opportunities?

10. If the law allows Plaintiff to recover specific amounts of money from Defendants as penalties for illegal automated or telemarketing calls, assuming Plaintiff has proven his case, will you award those damages regardless of the amounts?

RESPECTFULLY SUBMITTED,

CRAIG CUNNINGHAM

By: /s/ David B. Levin
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CERTIFICATE OF SERVICE

I hereby certify that, on May 10, 2019, a copy of the foregoing Proposed Voir Dire Questions was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt.

/s/ David B. Levin
Attorney for Plaintiff